

STATUS OF IMPLEMENTATION – AUDIT SERVICES DIVISION REPORT RECOMMENDATIONS

Audit Report Title: Courthouse Access Keycards: Controls Needed to Ensure Keycards are Deactivated When Users Terminate

File Number: 24-728
Status Report Date: February 2025

Audit Issued: August 2024
Department: DAS – Facilities Management Division

Open Recommendations

Recommendation #1	
<p>Recommendation - August 2024 <i>Facilities update its internal Procedures Manual related to keycard replacement to direct staff to terminate the old keycard that is being replaced within its keycard database.</i></p>	
<p>Deadlines Established Y/N? Y</p>	
Date	Management Comments:
Current - Feb 2025	<p>DAS – Facilities Management Division Update:</p> <p>1. Facilities Management Division (FMD) and IMSD are partnering with all courthouse departments to confirm both badge access needs and verify that all listed employees in Dayforce are active employees. Once all employee data is confirmed, we will begin transferring all active employee access data into the C-Cure 9000 system and issue new access cards to all employees. This transition will make all current INET badges invalid, preventing their use on badge readers. Due to the need to coordinate with every department before the transition, the project timeline will be extended to March 2025.</p> <p><u>It should be noted that the current security technology upgrades were funded through an ARPA Project.</u></p> <p>Expected Completion: August 2025.</p> <p>2. The implementation of new procedures on AMOP 14.02 has been postponed until after C-Cure is fully installed due to two key issues. One of the two computers operating the current system has failed and cannot be repaired, leaving only one functioning computer, which is experiencing issues loading everything needed. Additionally, to avoid creating temporary processes specific to INET that would then need to be completely overhauled for C-Cure, we have decided to delay implementation until the new system is in place.</p> <p>Expected Completion: August 2025.</p>
Audit response – August 2024	<p>1. Facilities Management is in the process of installing a new access control system (trade name C-Cure 9000) that will automatically deactivate old keycards once a</p>

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	<p>replacement is issued.</p> <p>2. Facilities Management will also update AMOP 14.02 by or before year-end 2024 to update procedures to include clear, step-by-step instructions for staff on how to deactivate old keycards. This will include screenshots, flowcharts, or other visual aids to ensure staff can follow the process easily and accurately. We will conduct training sessions for all relevant staff on the new procedures for keycard replacement and deactivation. The revised procedure will also include regular audits conducted to ensure compliance with these updated procedures.</p>
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Recommendation #2	
<p>Recommendation – August 2024 <i>Facilities conduct a review at least semi-annually of all keycards to determine if duplicate keycards exist within the system and deactivate keycards as necessary.</i></p>	
<p>Deadlines Established Y/N? Y</p>	
Date	Management Comments:
<p>Current – Feb 2025</p>	<p style="background-color: yellow;">DAS – Facilities Management Division Update:</p> <p>1. The Facilities Management Division (FMD) is implementing the C-Cure 9000 system, which will include an automated process to regularly scan the keycard database for duplicate entries. The software will flag potential duplicates for review and, when applicable, automatically deactivate redundant keycards. This feature will streamline the identification and removal of unauthorized or duplicate access cards, ensuring tighter access control measures.</p> <p>Expected Completion: August 2025.</p> <p>2. Once C-Cure 9000 is fully implemented and all new access cards are administered, we will update AMOP 14.02 with a formalized audit process for reviewing keycards. This step cannot be completed until we fully understand how this function operates within C-Cure, as the audit process will rely on utilizing the software to conduct these reviews. The audit framework will be designed to ensure compliance and proper access management across all departments.</p> <p>Expected Completion: September 2025.</p>

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<p>Audit response – August 2024</p>	<ol style="list-style-type: none"> 1. Facilities Management is in the process of installing a new access control system (trade name C-Cure 9000) that will scan the keycard database for duplicates on a regular basis. The software can flag duplicate entries for review and automatically deactivate any keycards identified as duplicates. 2. Facilities Management will also update AMOP 14.02 by or before year-end 2024 to update procedures to establish a schedule for annual manual reviews by dedicated staff. These reviews should involve cross-referencing keycard records with employee and contractor databases to ensure no duplicates are present.
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Recommendation #3	
<p>Recommendation - August 2024 <i>Facilities conduct an immediate review of current active keycards to determine which keycards should no longer be active and then deactivate the keycards.</i></p>	
Deadlines Established Y/N?	Y
Date	Management Comments:
<p>Current – Feb 2025</p>	<p>DAS – Facilities Management Division Update:</p> <ol style="list-style-type: none"> 1. The INET system has experienced critical failures that have made it difficult to keep running and have caused issues with retrieving data. Due to these challenges, we have been unable to effectively utilize the system to extract keycard records for review. As a result, we will rely on the C-Cure 9000 onboarding process to deactivate all INET cards, providing us with a clean slate to ensure that only authorized individuals receive new access credentials. Expected Completion: August 2025. 2. A formal protocol for the immediate deactivation of keycards will be developed for AMOP 14.02, once we have full access to and knowledge of the C-Cure 9000 system. This will allow us to properly design and implement a process that aligns with the system’s capabilities, ensuring an efficient and accurate method for managing access control. Expected Completion: September 2025.

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Audit response – August 2024	<ol style="list-style-type: none"> Facilities Management will conduct a full audit of all active keycards immediately. This involves cross-referencing the keycard database with current employee and contractor records to identify keycards that should be deactivated. Any discrepancies found will be addressed promptly by contacting departments and managers to confirm that individuals with active keycards are still employed or contracted. We will deactivate keycards for individuals who are no longer associated with the organization. Facilities Management will also update AMOP 14.02 to create a clear protocol for the immediate deactivation of keycards identified as no longer needed. This protocol should include steps for notifying relevant personnel, updating the keycard management system, and physically retrieving deactivated keycards if necessary.
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Recommendation #4	
Recommendation – August 2024	
<i>Facilities pursue the addition of the County issued employee number onto its Card Access Request Form and enter this information into the individual's record within their keycard access system. An identifier for non-County employee keycards should also be implemented to assist in tracking of non-employee keycards for responsible departments.</i>	
Deadlines Established Y/N?	
Y	
Date	Management Comments:
Current – Feb 2025	<p>DAS – Facilities Management Division Update:</p> <ol style="list-style-type: none"> Facilities Management Division (FMD) will update AMOP 14.02 to require a County-issued employee number on the Card Access Request Form. This adjustment will ensure that all keycards issued are properly linked to an employee record, improving tracking and accountability. However, this policy update cannot be finalized until C-Cure 9000 is fully operational, as the process must align with the new system's capabilities. Once C-Cure is in place, we will review its functionalities and adjust policies accordingly. <p>Expected Completion: September 2025.</p> <ol style="list-style-type: none"> A unique identifier system for non-County employees, including contractors and vendors, will be developed and incorporated into C-Cure 9000. This system will allow us to distinguish between full-time employees and external personnel while

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	<p>maintaining strict access control measures. As with the employee number requirement, this identifier system will be configured once C-Cure is operational to ensure compatibility with the software.</p> <p>Expected Completion: September 2025.</p>
<p>Audit response – August 2024</p>	<ol style="list-style-type: none"> <i>Facilities Management will also update AMOP 14.02 to update the Card Access Request Form to include a mandatory field for the County-issued employee number. Ensure that this number is entered into the keycard access system when a new keycard is issued or an existing one is updated. This will help in easily identifying and managing keycards issued to County employees. We will also implement a unique identifier system for non-County employees (e.g., contractors, vendors).</i> <i>Facilities will update the keycard management system to accommodate these new fields and ensure the system can generate reports that include these identifiers for better tracking and auditing. If the current software proves incapable, we will include this requirement in the replacement C-Cure system implementation.</i>

Recommendation #5	
<p>Recommendation – August 2024 <i>Facilities should work with the Department of Human Resources to update the form contained in AMOP 02.03.07 to instruct departments to return collected keycards from separating employee to Facilities.</i></p>	
<p>Deadlines Established Y/N?</p>	<p>N</p>
Date	Management Comments:
<p>Current – Feb 2025</p>	<p>DAS – Facilities Management Division Update:</p> <ol style="list-style-type: none"> Facilities Management Division (FMD) will collaborate with the Department of Human Resources to update AMOP 02.03.07, ensuring that the form includes clear instructions for departments to return collected keycards when an employee separates from the organization. This revision cannot be finalized until C-Cure 9000 is fully implemented, as the keycard return process must align with the system’s deactivation capabilities. Once C-Cure is operational, we will integrate the keycard return process into the employee offboarding checklist, ensuring that

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	<p>all separating employees return their keycards before their last working day, with FMD verifying deactivation within the C-Cure system.</p> <p>Expected Completion: September 2025.</p>
Audit response – August 2024	<p>Facilities will advise the Human Resources department and suggest revision of their AMOP 02.03.07 form to include clear instructions for departments to return collected keycards to Facilities when an employee separates from the organization. Ensure the updated form highlights this step prominently. Facilities will collaborate with the HR department as needed to integrate the keycard return process into the employee offboarding checklist. The goal is to ensure that returning keycards becomes a standard procedure when employees leave the organization.</p>

Recommendation #6	
<p>Recommendation - August 2024 <i>Facilities should develop written policies and procedures to conduct an annual review of active keycards to active employees within the County’s payroll system and a review by each department of keycards issued with their approval.</i></p>	
<p>Deadlines Established Y/N? Y</p>	
Date	Management Comments:
Current – Feb 2025	<p style="background-color: yellow;">DAS – Facilities Management Division Update:</p> <p>1. Facilities Management Division (FMD) will develop and document a formal policy requiring an annual review of all active keycards to ensure access records remain accurate. This policy will mandate that each department verifies and approves the continued access of their employees and contractors. However, this review process cannot be finalized until C-Cure 9000 is fully operational, as the system’s capabilities will dictate how keycard audits are conducted. Once C-Cure is in place, we will design the review process to align with its reporting and auditing functions, ensuring an efficient and enforceable keycard management system. These audits will be conducted annually each December, starting in 2025, to ensure all access records are reviewed before the new year.</p> <p>Expected Completion: November 2025.</p>

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<p>Audit response – August 2024</p>	<p>Facilities Management will develop and document a formal policy that mandates an annual review of all active keycards and will update AMOP 14.02 to include this requirement. This policy should detail the responsibilities of each department in verifying the status of keycards issued to their employees. This process will require each department to affirm each and every active keycard they have approved and issued and will deactivate any not confirmed valid. This review will annually verify that all keycards are accounted for and that they have been issued appropriately.</p>
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<p style="text-align: center;">Recommendation #7</p>	
<p>Recommendation - August 2024 <i>Facilities should add specific written policies and procedures on the deactivation of access keycards upon the termination of County programs or buildings.</i></p>	
<p>Deadlines Established Y/N?</p>	<p>Y</p>
<p>Date</p>	<p>Management Comments:</p>
<p>Current – Feb 2025</p>	<p>DAS – Facilities Management Division Update:</p> <p>1. Facilities Management Division (FMD) will develop and document a formal policy for the deactivation of access keycards when a County program is terminated or a building is closed. This policy cannot be finalized until C-Cure 9000 is fully operational, as the system’s functionalities will determine how access removals are processed and tracked. Once C-Cure is in place, we will create a standardized checklist and notification process to ensure that all relevant departments are informed of program terminations or building closures, and that keycard access is deactivated accordingly.</p> <p>Expected Completion: August 2025.</p>
<p>Audit response – August 2024</p>	<p>Facilities Management will develop and document a formal policy and procedures for the deactivation of access keycards when a County program is terminated or a building is closed and will update AMOP 14.02 to include this requirement. This policy will create a standardized checklist to be used during the closure of any County program or building and establish a clear communication protocol to ensure that all relevant departments are informed of program terminations or building closures.</p>

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Recommendation #8	
<p>Recommendation - August 2024 <i>Facilities update its AMOP and Procedural manual to include clear direction for non-County access keycard holders such as State employees when access keycards should be terminated.</i></p>	
<p>Deadlines Established Y/N? Y</p>	
Date	Management Comments:
Current – Feb 2025	<p style="background-color: yellow;">DAS – Facilities Management Division Update:</p> <p>1. Facilities Management Division (FMD) will develop and document a formal policy outlining the deactivation process for non-County keycard holders, such as state employees. This policy cannot be finalized until C-Cure 9000 is fully operational, as the system’s capabilities will determine how non-County access is managed and tracked. Once C-Cure is in place, we will update AMOP 14.02 to include clear guidelines for when and how non-County access should be terminated, ensuring consistency across all departments.</p> <p>Expected Completion: September 2025.</p>
Audit response – August 2024	Facilities Management will develop and document a formal policy and procedures for the deactivation of access for non-County access keycard holders such as state employees and will update AMOP 14.02 to include this requirement.

Recommendation #9	
<p>Recommendation - August 2024 <i>Facilities should develop written policies and procedures to conduct a periodic monitoring process to determine keycards that should be deactivated within the system that are from the DA, Public Defender, and Chief Judge’s Office along with elected judges and other judicial staff.</i></p>	
<p>Deadlines Established Y/N? Y</p>	
Date	Management Comments:
Current – Feb 2025	<p style="background-color: yellow;">DAS – Facilities Management Division Update:</p> <p>1. Facilities Management Division (FMD) will develop and document a formal policy for the periodic review and deactivation of access keycards assigned to judicial staff, including employees from the District Attorney’s Office, Public Defender’s Office, Chief Judge’s Office, elected judges, and other judicial personnel. This policy cannot</p>

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	<p>be finalized until C-Cure 9000 is fully operational, as the system’s capabilities will determine how keycard reviews are conducted and tracked. Once C-Cure is in place, we will establish a structured review process in collaboration with judicial offices to ensure timely updates to access permissions.</p> <p>Expected Completion: September 2025.</p>
<p>Audit response – August 2024</p>	<p>Facilities Management will develop and document a formal policy and procedures for the deactivation of access for non-County access keycard holders such as state employees and will update AMOP 14.02 to include this requirement. We will develop a coordination protocol with the judicial offices to ensure timely communication regarding any changes in staff or access needs. This includes creating a liaison role or committee that meets regularly to discuss keycard management and address any issues promptly.</p>

<p align="center">Recommendation #10</p>	
<p>Recommendation - August 2024 <i>Facilities develop written policies and procedures to conduct a review of keycards within its permanent database to determine if contractor keycards are in the database and should be moved to the temporary database.</i></p>	
<p>Deadlines Established Y/N? Y</p>	
<p>Date</p>	<p>Management Comments:</p>
<p>Current – Feb 2025</p>	<p>DAS – Facilities Management Division Update:</p> <p>1. Facilities Management Division (FMD) will develop and implement a process to review all contractor keycards and ensure they are correctly categorized within the keycard database. This process will involve determining whether contractor keycards should remain in the permanent database or be transitioned to a temporary database for better tracking and access control. However, this review process cannot be finalized until C-Cure 9000 is fully operational, as its system capabilities will dictate how contractor keycard management is structured. Once C-Cure is in place, we will establish a formal process for auditing contractor keycards and ensuring proper categorization and deactivation as necessary.</p> <p>Expected Completion: September 2025.</p>

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<p>Audit response – August 2024</p>	<ol style="list-style-type: none"> 1. Facilities Management is in the process of installing a new access control system (trade name C-Cure 9000) that will establish a clear segmentation within the keycard management system to distinguish between permanent and temporary keycards. We will ensure that contractor keycards are categorized correctly and moved to the temporary database when necessary. 2. Facilities Management will also update AMOP 14.02 by or before year-end 2024 to update procedures to include clear, step-by-step instructions for staff on how to classify, segment, audit and deactivate contractor and other temporary keycards.
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Recommendation #11

Recommendation - August 2024

Facilities add written policies and procedures on Time & Material contracts to specify what reasons are valid when a contract is extended beyond the current three-year limit along with any required documentation. In addition, clarify what documentation is required when a price increase occurs.

Deadlines Established Y/N?

Y

Date

Management Comments:

Current – Feb 2025

Audit response – August 2024

Facilities Management will update its internal policy on T&M contracting by or before year-end 2024 to update procedures to specify what reasons are valid when a contract is extended beyond the current three-year limit along with any required documentation. In addition, the policy will clarify what documentation is required when a price increase occurs.

Newly Closed Recommendations

None

Previously Closed Recommendations

None